

CENTENNIAL COMMUNICATIONS

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August 1, 2003

David Solomon, Chief
Enforcement Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

John Muleta, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Fourth Quarterly Report of Centennial Communications Corp.
On Phase II E911 Compliance**

Dear Messer's Solomon and Muleta:

Pursuant to the FCC's Order to Stay issued in CC Docket No. 94-102,¹ Centennial Communications Corp. ("Centennial") hereby files its fourth Quarterly Report detailing our progress in deploying Phase I and Phase II enhanced 911 ("E911") service in our markets. Because Centennial provides CMRS service in two distinct markets, this report is divided into two sections -- the first explaining the status of Phase II E911 deployment in Puerto Rico, and the second part reports on Phase II E911 deployment in our domestic markets. In addition, we are attaching the Excel spreadsheet detailing our E911 implementation status, as recently required by the Commission.²

I. Puerto Rico

Centennial Puerto Rico License Corp., a subsidiary of Centennial, holds the B block broadband PCS license for MTA 25 – Puerto Rico/US Virgin Islands. Centennial has chosen a network-based solution to deploy Phase II E911 in this MTA. A single PSAP serves Centennial's entire service area in Puerto Rico. Centennial still has not yet received a valid request for Phase I or II E911 service from this sole PSAP. However, we continue to be in regular contact with the PSAP, and we are aware that the PSAP has begun the planning and implementation process for both Phase I and Phase II E911 service. While it had been our

¹ FCC 02-210, released July 26, 2002.

² See *Public Notice, Wireless Telecommunications Bureau Standardizes Carrier Reporting on Wireless E911 Implementation*, DA 03-1902, released June 6, 2003.

understanding that the Puerto Rico 9-1-1 Governing Board hoped to have the PSAP operational for Phase I and Phase II service by the end of 2003, as noted above, we have not yet received a request for E911 service from the PSAP. Because Centennial attended the first PSAP RFP planning meeting on August 19, 2002, and have remained in regular contact with the 9-1-1 Governing Board, we believe that we are in a very good position to monitor the PSAP's progress and to coordinate our E911 Phase II implementation process with the PSAP's process.

In addition, Centennial now provides service to the U.S. Virgin Islands of St. Croix and St. Thomas. Each island is served by a single PSAP; however neither PSAP has made a request to Centennial for either Phase I or Phase II E911 service.

II. Domestic Markets

Through five different subsidiaries,³ Centennial holds licenses to provide digital cellular service in 30 markets in the Midwest and Southern United States. Centennial provides cellular service in the following six states: Indiana, Louisiana, Michigan, Mississippi, Ohio and Texas. Centennial has chosen a network-based solution offered by Grayson Wireless to deploy Phase II E911 in its domestic markets.⁴

Phase I Service – As we have previously reported, Centennial continues to receive PSAP requests for Phase I E911 service and we continue to implement Phase I service as valid requests are received. As we noted previously, Phase I E911 service has been fully deployed in our Texas markets. In addition, as of March 2003, Phase I E911 service has been fully deployed to all PSAPs in Indiana where Centennial operates. Centennial also notes that, to date, we have not received any valid requests for Phase I (or Phase II) E911 service from PSAPs in the state of Ohio. Finally, Centennial notes that it is in the process of implementing Phase I service to all PSAPs in Michigan and Louisiana that have submitted a Phase I request to us, regardless of the validity of the request or the readiness of the PSAP. As indicated in the attached Excel spreadsheet, Centennial expects to implement Phase I service in the majority of these markets between September 1 and October 31 of this year.

Phase II Service - As Centennial previously has advised the Commission, we are implementing Grayson Wireless' "Geometrix" network overlay solution for E911 Phase II compliance in our domestic markets.⁵ As detailed in the attached Excel spreadsheet, we are still in the pre-deployment engineering stage of the Phase II implementation process for many markets, in the deployment stage for fifteen markets, and we have deployed Phase II E911

³ Baucse Communications of Beaumont, Inc., Centennial Michiana License Company LLC, Centennial Southeast License Company LLC, Elkhart Metronet, Inc. and Lafayette Cellular Telephone Company.

⁴ See Centennial Communications Corp. Amended Report on E911 Reporting Requirements, filed September 9, 2002.

⁵ *Id.*

service to the Steuben County, OH PSAP. We expect to be Phase II “live” in Allen County, Indiana imminently, and by August 15, 2003 in Lafayette County, Louisiana. We have received “invalid” requests for Phase II service from 10 PSAPs (eight of which are located in Indiana, and two of which are located in Louisiana.)

As of the date of this report, Centennial still has not received any Phase II E911 service requests from PSAPs in Mississippi, Ohio or Texas. We have received only one request for Phase II service from a PSAP located in Michigan (Saint Joseph’s County, which we expect to deploy by late September 2003), and three Phase II requests from Louisiana PSAPs (two of which are invalid, one of which will be deployed shortly). In Indiana, we continue to work with the Indiana Enhanced Wireless 911 Board and its Cost Recovery Group (“Indiana Board”) in coordinating Phase II E911 deployment, and with the PSAPs in Indiana that have not yet perfected their Phase II requests. While Centennial did not deploy Phase II service to any PSAP by the March 1, 2003 deadline, we did negotiate mutually acceptable deployment target dates with each PSAP that has submitted a valid request for Phase II service. In addition, we continue to work cooperatively with these PSAPs when we encounter issues that result in delays to the previously-negotiated mutually acceptable deployment dates.

In sum, because Centennial has negotiated mutually acceptable Phase II implementation schedules with each of the PSAPs in its domestic markets that had submitted valid Phase II requests,⁶ Centennial presently is in compliance with all applicable Phase II deployment benchmarks.

III. Affidavit

I hereby declare under penalty of perjury that the information provided in this response is true and accurate to the best of my knowledge, information and belief.

If you have any questions regarding this report, or require additional information, please contact me, or Terry Cavanaugh at Cole, Raywid & Braverman, LLP, counsel for Centennial, at 202-82-9857.

Sincerely,

/s/ Lourdes L. Lucas

Lourdes L. Lucas
Vice President, Legal Affairs
Centennial Communications Corp.

⁶ See Order on Reconsideration, Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Petition of City of Richardson, Texas, FCC 02-318, released November 26, 2002

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